

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND (State Bar No. 83013)
STEPHEN J. NEWMAN (State Bar No. 181570)
BRIAN C. FRONTINO (State Bar No. 222032)
JEFFREY B. BELL (State Bar No. 269648)
2029 Century Park East
Los Angeles, CA 90067-3086
Telephone: 310-556-5800
Facsimile: 310-556-5959
Email: lacalendar@stroock.com

Attorneys for Defendant
TRANSUNION LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SERGIO L. RAMIREZ, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

Case No. 3:12-cv-00632-JSC

**STIPULATION TO FURTHER EXTEND
TIME FOR DEFENDANT TRANSUNION
LLC TO RESPOND TO INITIAL
COMPLAINT**

WHEREAS, on February 9, 2012, plaintiff Sergio Ramirez ("Plaintiff") filed the class action complaint in this action (the "Complaint") against TransUnion LLC ("TransUnion"), which Complaint was served on TransUnion on February 16, 2012;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), TransUnion's initial time to respond to the Complaint was March 8, 2012;

WHEREAS, pursuant to Local Rule 6-1(a), parties may stipulate in writing, without court order, to extend the time within which to answer or otherwise respond to the complaint, provided the change will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, the parties previously agreed to extend the deadline for TransUnion to respond to the Complaint to and including March 29, 2012;

WHEREAS, due to the absence of key TransUnion personnel, TransUnion has requested, and Plaintiff has agreed, to further extend the deadline for TransUnion to answer or otherwise respond to the Complaint to and including April 6, 2012; and

WHEREAS, the further extension proposed herein will not alter the date of any event or any deadline already fixed by Court order;

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel of record, that TransUnion's time to answer or otherwise respond to the Complaint is extended to and including April 6, 2012.

Dated: March 29, 2012

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
STEPHEN J. NEWMAN
BRIAN C. FRONTINO

By: /s/ Jeffrey B. Bell
Jeffrey B. Bell

Attorneys for Defendant
TRANSUNION LLC

1 Dated: March 29, 2012

ANDERSON, OGILVIE & BREWER, LLP
ANDREW J. OGILVIE
CAROL MCLEAN BREWER

4 By: /s/ Andrew J. Ogilvie
Andrew J. Ogilvie

6 Attorneys for Plaintiff
SERGIO L. RAMIREZ

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

DECLARATION OF JEFFREY B. BELL

I, Jeffrey B. Bell, hereby declare as follows:

1. I am admitted to practice before this Court and am an associate at Stroock & Stroock & Lavan LLP ("Stroock"), counsel for defendant TransUnion LLC ("TransUnion") in this action. I submit this Declaration in support of the Stipulation to Further Extend Time for TransUnion to Respond to Initial Complaint (the "Stipulation"), in accordance with Section X.B. of General Order 45 of this Court. The facts set forth herein are true of my own personal knowledge. If called as a witness, I could and would competently testify thereto.

2. On March 29, 2012, Andrew J. Ogilvie, counsel for plaintiff Sergio L. Ramirez, sent me an e-mail approving the content of the Stipulation, which I drafted and sent to him for his review and approval on March 28, 2012, and authorizing me to execute it on his behalf.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of March, 2012.

/s/ Jeffrey B. Bell
Jeffrey B. Bell

Dated: 3/30/2012

